

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT- ATHLETE CONCUSSION INJURY LITIGATION THIS DOCUMENT RELATES TO:	MDL No. 2492 Judge John Z. Lee Magistrate Judge Brown
Walker, et al. v. National College Athletic Assoc.,	No. 1:13-cv-00293 (E.D. Tenn.)
Morgan, et al. v. National Collegiate Athletic Assoc.,	No. 1:13-cv-03174 (D. Minn)

***DOUGHTY* PLAINTIFFS’ JOINDER OF *WALKER* AND *MORGAN* PLAINTIFFS’
MOTION TO TEMPORARILY ENJOIN THE ONGOING *ARRINGTON* MEDICAL
MONITORING CLASS SETTLEMENT NEGOTIATIONS WITH DEFENDANT NCAA**

COMES NOW, Plaintiff, STANLEY DOUGHTY, individually and on behalf of himself and others similarly situated (hereinafter collectively referred to as “Plaintiff Doughty and the Class”), by and through the undersigned attorneys, and wish to join in and support the *Walker* and *Morgan* Plaintiffs Motion to Enjoin the *Arrington* Medical Monitoring Class Settlement Negotiations (MDL No. 2492, Doc. #5).

The Plaintiff Doughty and the Class are similarly excluded from the *Arrington* medical monitoring class definition because:

- (a) They played before 2004, and/or
- (b) They played in one of the 32 states excluded by the *Arrington* medical monitoring class definition.

Arrington class counsel and *Arrington* class representatives have explicitly acted through Court filings to exclude Former Players Before 2004 and Former Players From 32 States from its Medical Monitoring Class. They have blatantly deprived these class members of their fair opportunity to obtain urgently needed medical monitoring, and placed their interests behind the *Arrington* class representatives who played after 2004 in only 18 states. Any settlement negotiation that does not provide independent and adequate representation for the Plaintiff Doughty and the Class would jeopardize urgently-needed and fair medical monitoring relief for hundreds of thousands of class members.

The Plaintiff Doughty and the Class seek fair and adequate representation in any medical monitoring class settlement negotiation and believe that *Arrington* counsel have manifested an intra-class conflict and adequacy defect making it impossible for *Arrington* counsel to represent the Plaintiff Doughty and the Class.

Respectfully Submitted,

/s/Chris T. Hellums

Chris T. Hellums

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